

APPENDIX 5.4—NOP

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

FILED
Gregory J. Smith, Recorder/County Clerk

FEB 22 2002

BY _____

NOTICE OF PREPARATION

The California Department of Parks and Recreation is the Lead Agency under the requirements of the California Environmental Quality Act and is considering the preparation of a program level (first-tier) environmental document for the project identified below.

PROJECT TITLE: Anza-Borrego Desert State Park General Plan

PROJECT LOCATION: San Diego County, Imperial County, Riverside County

Anza-Borrego Desert State Park, the largest unit in the California State Park system, is over 640,000 acres of land that spans across the eastern portion of San Diego County, stretching east into Imperial County and north into Riverside County. The park is approximately a two-hour drive from San Diego, Riverside and Palm Springs. The park is near the communities of Borrego Springs, Ocotillo, Canebrake, and Julian. The Mid-Western edge of Anza-Borrego Desert State Park borders with Cuyamaca Rancho State Park and Cleveland National Forest. The majority of the park is classified as a state Wilderness area.

PROJECT DESCRIPTION: To meet requirements set forth in Section 5002.2 of the Public Resources Code and section 4332 of the title 14 of the California Administration Code, The California Department of Parks and Recreation is preparing a General Plan for the park. This plan will delineate a number of resource management zones and a set of goals and guidelines will be developed for each zone, which will guide park management, specific project management, and implementation. These goals and guidelines will address recreational, operational, interpretive, and resource management opportunities and constraints consistent with the classifications of State Park and State Wilderness, as set forth in section 5019.53 and 5019.68 of the Public Resources Code and with Department Resource Management Directives. The General Plan will not actually locate or design facilities, but instead will provide goals and guidelines for the appropriate types, locations, and designs of facilities that may be proposed in the future. The General Plan will establish the primary interpretive themes for interpretive programs and activities.

Current facilities within the park include the visitor center, which is located near the park headquarters at 200 Palm Canyon Drive Borrego Springs, CA. The park contains four developed campgrounds: Borrego Palm Canyon, Vern Whitaker Horse Camp, Tamarisk Grove and Bow Willow Campground. Primitive campgrounds provide a more rugged experience and offer less facilities (Culp

Valley, Sheep Canyon, Arroyo Salado, Yaqui Pass, Yaqui Well, Fish Creek, Blair Valley, Mountain Palm Springs). Over 500 miles of dirt roads and extensive trails are available for recreational activities.

POSSIBLE ENVIRONMENTAL EFFECTS: The project has potential effects on geologic features, erosion, water quality, transportation, biological resources, fire and geologic hazards, aesthetics, cultural resources, the natural environment and recreation. By establishing management zones, goals and guidelines, the General Plan will endeavor to identify broad level avoidance, mitigation measures, and policies to reduce potential impacts of future projects and activities to a level below significance. However, additional environmental review will be conducted as these projects and any corresponding mitigation measures are proposed.

PUBLIC MEETINGS: The California Department of Parks and Recreation has an active public involvement program for the development of this plan through ongoing workshops. The first three workshops focused on General Plan issues and were held in Borrego Springs on April 27, 2000, San Diego on June 20, 2000, and Manhattan Beach on June 22, 2000. Three alternative management plans were presented at workshops at the following locations: San Diego on June 14, 2001, Riverside on June 21, 2001, and Borrego Springs on October 17, 2001. The next public workshop is currently scheduled for April 18, 2002 at the Borrego Springs High School, at which time the preferred alternative plan will be presented.

PLAN DEVELOPMENT & ENVIRONMENTAL REVIEW: Once written and prepared, the Draft General Plan, including an environmental analysis section, will be made available for public review and comment in accordance with the California Environmental Quality Act (CEQA). The Draft General Plan will then be refined, and responses to public comments prepared. The plan will then be presented along with public comments, and responses to comments, to the California State Parks and Recreation Commission for approval at the public hearing.

Site specific management plans or facility development plans will be subsequently prepared in conformance with the approved General Plan and CEQA, as funding becomes available. The Department intends to develop a roads and trails management plan for the park. Specific management plans will go through a separate environmental and public review process in accordance with CEQA.

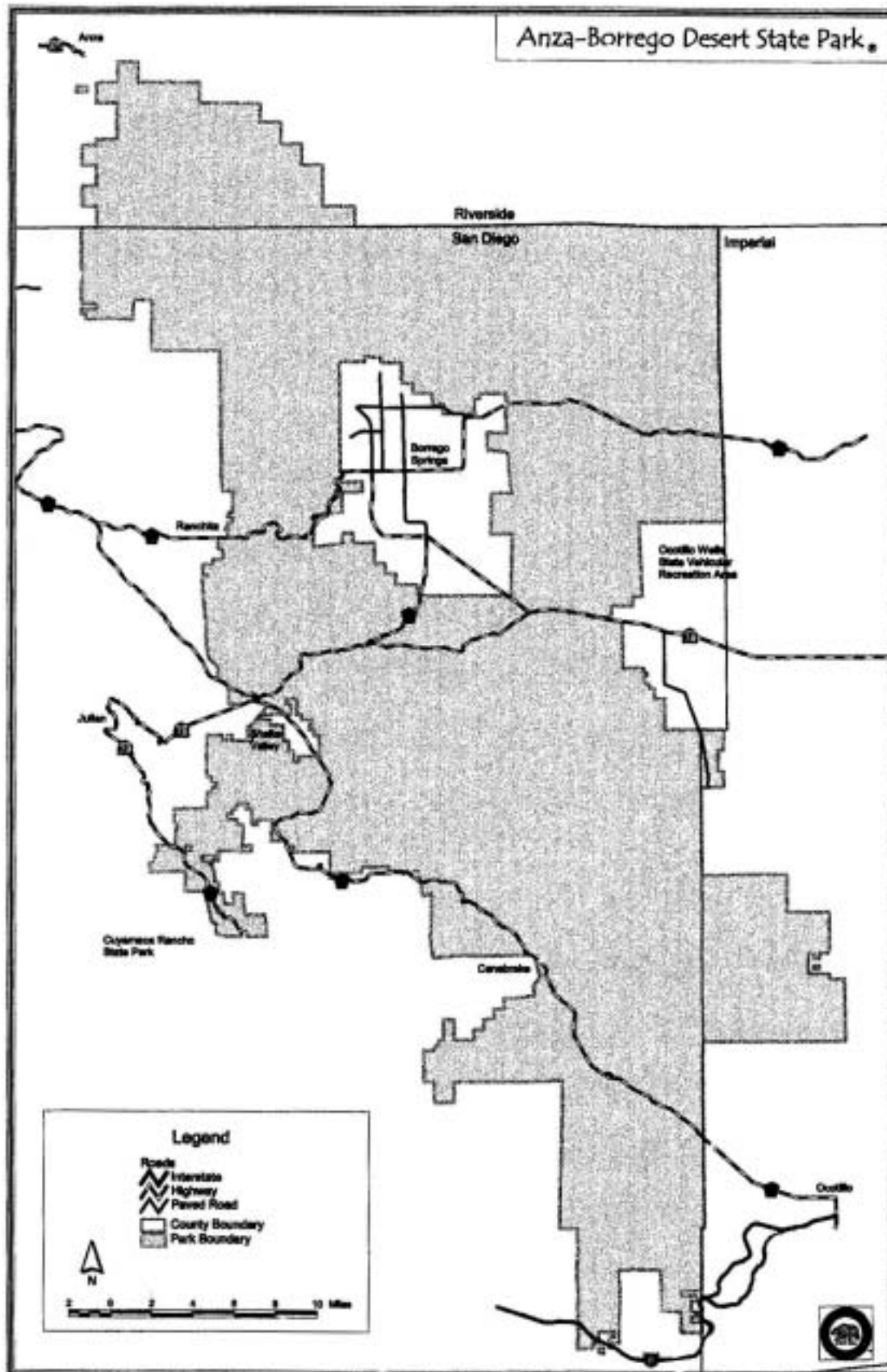
We need to know the views of your agency or organization as to the scope and content of the environmental information that is germane to your agency's or organization's statutory responsibilities in connection with the proposed project. Your response must be sent to the address below not later than thirty (30) days after the receipt of this notice. We would appreciate the name of a contact person in your agency.

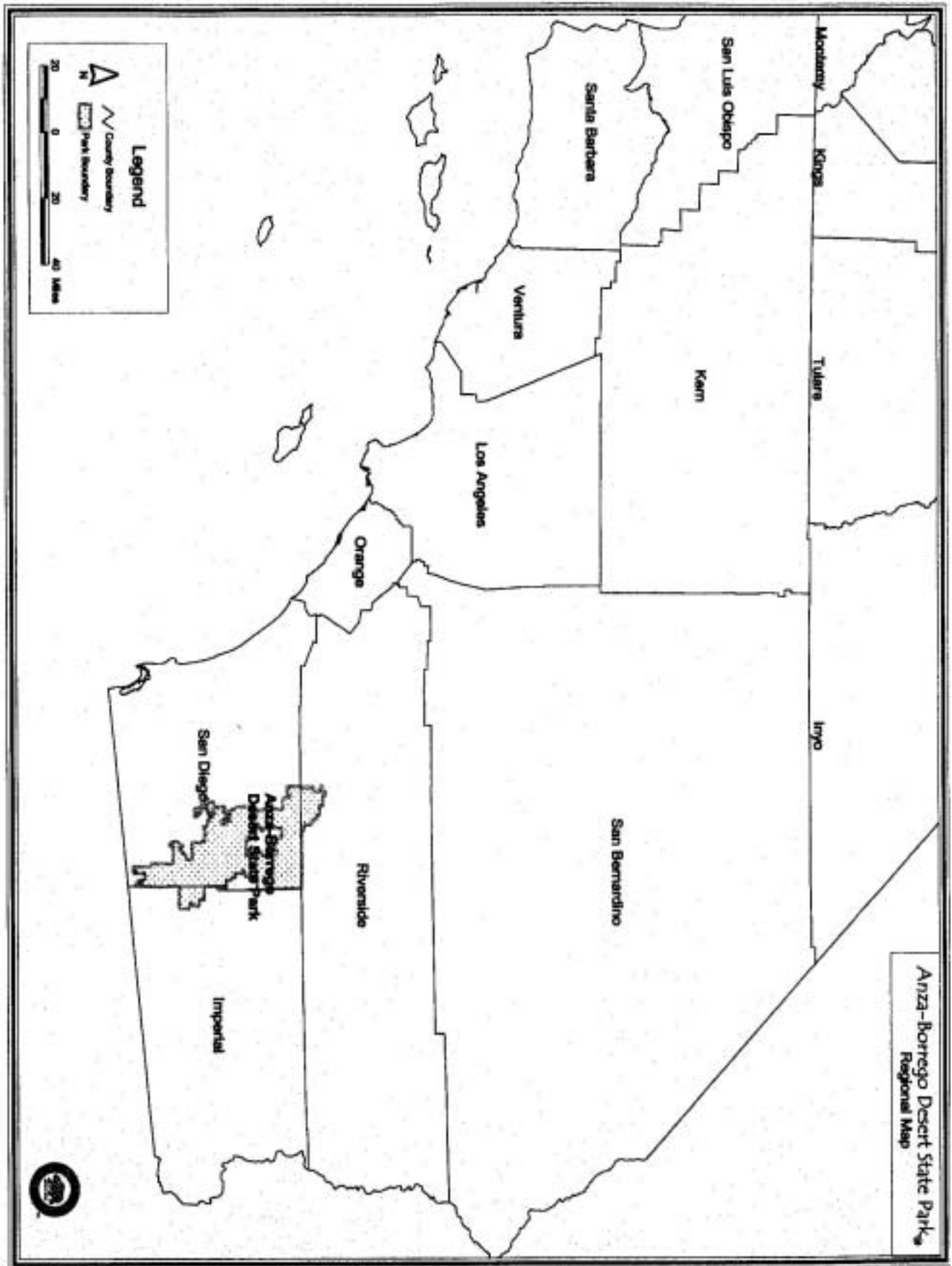
DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON

Michelle Fredrickson, Assistant Environmental Coordinator or
Tina Robinson, Associate Park and Recreation Specialist
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

(619) 220-5300

FILED IN THE OFFICE OF THE COUNTY CLERK	
SAN DIEGO COUNTY ON <u>FEB 22 2002</u>	
POSTED <u>FEB 22 2002</u>	REMOVED <u>MAR 25 2002</u>
RETURNED TO AGENCY ON <u>MAR 25 2002</u>	
DEPUTY <u>WJ</u>	







Gray Davis
GOVERNOR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
State Clearinghouse



Steven A. Nissen
DIRECTOR

Notice of Preparation

February 11, 2002

To: Reviewing Agencies

Re: Anza-Borrego Desert State Park
SCH# 2002021060

Attached for your review and comment is the Notice of Preparation (NOP) for the Anza-Borrego Desert State Park draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Tina Robinson
Department of Parks and Recreation
8885 Rio San Diego Drive
San Diego, CA 92108

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML



**Document Details Report
State Clearinghouse Data Base**

SCH# 2002021060
Project Title Anza-Borrego Desert State Park
Lead Agency Parks and Recreation, Department of

Type NOP Notice of Preparation
Description To meet requirements set forth in Section 5002.2 of the Public Resources Code and Section 4332 of Title 14 of the California Administration Code, the California Department of Parks and Recreation is preparing a General Plan for the park. This plan will delineate a number of resource management zones and a set of goals and guidelines will be developed for each zone, which will guide park management, specific project management and implementation. These goals and guidelines will address recreational, operational, interpretive, and resource management opportunities and constraints.

Lead Agency Contact

Name	Tina Robinson		
Agency	Department of Parks and Recreation		
Phone	619-220-5300	Fax	
email			
Address	8885 Rio San Diego Drive		
City	San Diego	State	CA Zip 92106

Project Location

County	San Diego, Riverside, Imperial		
City			
Region			
Cross Streets	County Roads S-2, S-3, S-22		
Parcel No.			
Township	Range	Section	Base

Proximity to:

Highways	79, 78, I-80
Airports	
Railways	(abandoned) San Diego/Yuma RR
Waterways	
Schools	
Land Use	State Park/State Wilderness

Project Issues Air Quality; Archeologic-Historic; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Vegetation; Wetland/Riparian; Landuse

Reviewing Agencies Resources Agency; Department of Conservation; Department of Forestry and Fire Protection; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Fish and Game, Region 6; Native American Heritage Commission; State Lands Commission; Caltrans, District 8; Caltrans, District 11; California Highway Patrol; Caltrans, Division of Transportation Planning; Department of General Services; Regional Water Quality Control Board, Region 7

Date Received	02/11/2002	Start of Review	02/11/2002	End of Review	03/12/2002
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Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: *San Diego, Riverside, Imperial*

SCH#

200201050

Resources Agency	Fish and Game	<input type="checkbox"/> Colorado River Board Gerald R. Zimmerman	<input type="checkbox"/> Dept. of Transportation 10 Chris Sayre District 10	<input type="checkbox"/> State Water Resources Control Board Greg Frazier Division of Water Quality
<input checked="" type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Dept. of Fish & Game Scott Flitt Environmental Services Division	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Lyn Barnett	<input checked="" type="checkbox"/> Dept. of Transportation 11 Lou Salazar District 11	<input type="checkbox"/> State Water Resources Control Board Mike Finkenston Division of Water Rights CEQA Tracking Center
<input type="checkbox"/> Dept. of Boating & Waterways Bill Curry	<input type="checkbox"/> Dept. of Fish & Game 1 Donald Koch Region 1	<input type="checkbox"/> Office of Emergency Services John Rowden, Manager	<input type="checkbox"/> Dept. of Transportation 12 Alison Kennedy District 12	<input type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input type="checkbox"/> Dept. of Fish & Game 2 Barry Curtis Region 2	<input type="checkbox"/> Delta Protection Commission Debby Eddy	<input type="checkbox"/> Business, Trans. & Housing	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Dept. of Conservation Roseanne Taylor	<input type="checkbox"/> Dept. of Fish & Game 3 Robert Floerke Region 3	<input type="checkbox"/> Santa Monica Mountains Conservancy Paul Edelman	<input type="checkbox"/> Housing & Community Development Cathy Creswell Housing Policy Division	<input type="checkbox"/> RWQCB 1 Catherine Hudson North Coast Region (1)
<input type="checkbox"/> Dept. of Forestry & Fire Protection Allen Robertson	<input type="checkbox"/> Dept. of Fish & Game 4 William Landemilk Region 4	<input type="checkbox"/> Dept. of Transportation District 1	<input type="checkbox"/> California Highway Patrol Lt. Julia Page Office of Special Projects	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Office of Historic Preservation Hans Knechteng	<input type="checkbox"/> Dept. of Fish & Game 5 Don Chadwick Region 5, Habitat Conservation Program	<input type="checkbox"/> Dept. of Transportation 2 Vicki Roe Local, Development Review, District 2	<input type="checkbox"/> Dept. of Transportation Ron Halgerson Caltrans - Planning	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Dept. of Parks & Recreation B. Noah Tipton Environmental Stewardship Section	<input checked="" type="checkbox"/> Dept. of Fish & Game 6 Gabrina Gatchel Region 6, Habitat Conservation Program	<input type="checkbox"/> Dept. of Transportation 3 Jeff Pulverman District 3	<input type="checkbox"/> Dept. of General Services Robert Slaggy Environmental Services Section	<input type="checkbox"/> RWQCB 4 Jonathan Bishop Los Angeles Region (4)
<input type="checkbox"/> S.F. Bay Conservation & Dev'l Comm. Steven Miodam	<input type="checkbox"/> Dept. of Fish & Game 6 WM Tammy Allen Region 6, Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> Dept. of Transportation 4 Joan Finney District 4	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> RWQCB 5S Central Valley Region (5)
<input type="checkbox"/> Dept. of Water Resources Resources Agency Nadell Gayou	<input type="checkbox"/> Dept. of Fish & Game M Tom Nagoll Marine Region	<input type="checkbox"/> Dept. of Transportation 5 James Kanner District 5	<input type="checkbox"/> Airport Projects Jim Lerner	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
Health & Welfare	Independent Commissions	<input type="checkbox"/> Dept. of Transportation 6 Maic Birbaum District 6	<input type="checkbox"/> California Integrated Waste Management Board Sue O'Leary	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Fredding Branch Office
<input type="checkbox"/> Health & Welfare Wayne Hubbard Dept. of Health/Drinking Water	<input type="checkbox"/> California Energy Commission Environmental Office	<input type="checkbox"/> Dept. of Transportation 7 Stephen J. Bursell District 7	<input type="checkbox"/> State Water Resources Control Board Diane Edwards Division of Clean Water Programs	<input type="checkbox"/> RWQCB 6 Lathorian Region (6)
Food & Agriculture	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Dept. of Transportation 8 Mike Sim District 8	<input type="checkbox"/> State Water Resources Control Board Diane Edwards Division of Clean Water Programs	<input type="checkbox"/> RWQCB 6V Lathorian Region (6) Victorville Branch Office
<input type="checkbox"/> Food & Agriculture Steve Shaffer Dept. of Food and Agriculture	<input type="checkbox"/> Public Utilities Commission Ken Lewis	<input checked="" type="checkbox"/> Dept. of Transportation 9 Coleen O'Brien District 9	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
	<input type="checkbox"/> State Lands Commission Bert Stiva		<input type="checkbox"/> RWQCB 9 San Diego Region (9)	
	<input type="checkbox"/> Governor's Office of Planning & Research State Cash/Program Planner			

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse-Office of Planning & Research, 1400 Tenth Street, Room 222
P.O. Box 3044, Sacramento, California 95812-3044 • 916/445-0813

SCH# 2002021060

Project Title: Anza-Borrego Desert State Park

Lead Agency: California Department of Parks and Recreation

Contact Person: Tina Robinson

Street Address: 8885 Rio San Diego Drive

Phone: (619) 220-5300

City: San Diego

Zip: 92108

County: San Diego

Project Location:

County: San Diego, Riverside, and Imperial Counties City/Nearest Community: Borrego Springs

Cross Streets: County Roads S-2, S-3, S-22 Zip Code: _____ Total Acres 640,000

Assessor's Parcel No. _____ Section: _____ Twp. _____ Range: _____ Base: _____

Within 2 Miles: State Hwy 79, 78, I-8 Waterways: _____

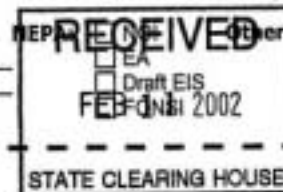
Airports: _____ Railways: Abandoned San Diego/Yuma RR Schools: _____

Document Type:

CEQA:

- ☒ NOP
☐ Early Cons
☐ Neg Dec
☐ Draft EIR

- ☐ Supplement/Subsequent EIR
(Prior SCH No.) _____
☐ Other _____



- ☐ Joint Document
☐ Final Document
☐ Other _____

Local Action Type:

- ☐ General Plan Update
☐ General Plan Amendment
☒ General Plan Element
☐ Community Plan

- ☐ Specific Plan
☐ Master Plan
☐ Planned Unit Development
☐ Site Plan

- ☐ Rezone
☐ Prezone
☐ Use Permit
☐ Land Division (Subdivision, etc.)

- ☐ Annexation
☐ Redevelopment
☐ Coastal Permit
☐ Other _____

Development Type:

- ☐ Residential: Units _____ Acres _____
☐ Office: Sq ft. _____ Acres _____ Employees _____
☐ Commercial: Sq ft. _____ Acres _____ Employees _____
☐ Industrial: Sq ft. _____ Acres _____ Employees _____
☐ Educational
☒ Recreational

- ☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ Watts _____
☐ Waste Treatment: Type _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Funding (approx.): Federal \$ _____ State \$ _____ Total \$ _____

Project Issues Discussed in Document:

- ☐ Aesthetic/Visual
☐ Agricultural Land
☒ Air Quality
☒ Archeological/Historical
☒ Coastal Zone
☒ Drainage/Absorption
☐ Economic/Jobs
☐ Fiscal
☒ Flood Plain/Flooding
☐ Forest Land/Fire Hazard
☒ Geologic/Seismic
☐ Minerals
☒ Noise
☒ Population/Housing Balance
☒ Public Services/Facilities
☐ Recreation/Parks

- ☐ Schools/Universities
☐ Septic Systems
☐ Sewer Capacity
☐ Soil Erosion/Compaction/Grading
☐ Solid Waste
☐ Toxic/Hazardous
☐ Traffic/Circulation
☒ Vegetation

- ☐ Water Quality
☐ Water Supply/Groundwater
☒ Wetland/Riparian
☐ Wildlife
☐ Growth Inducing
☒ Landuse
☐ Cumulative Effects
☐ Other _____

Present Land Use/Zoning/General Plan Designation:

State Park/State Wilderness

Project Description: To meet requirements set forth in Section 5002.2 of the Public Resources Code and section 4332 of the title 14 of the California Administration Code, The California Department of Parks and Recreation is preparing a General Plan for the park. This plan will delineate a number of resource management zones and a set of goals and guidelines will be developed for each zone, which will guide park management, specific project management, and implementation. These goals and guidelines will address recreational, operational, interpretive, and resource management opportunities and constraints

consistent with the classifications of State Park and State Wilderness, as set forth in section 5019.53 and 5019.68 of the Public Resources Code and with Department Resource Management Directives. The General Plan will not actually locate or design facilities, but instead will provide goals and guidelines for the appropriate types, locations, and designs of facilities that may be proposed in the future. The General Plan will establish the primary interpretive themes for interpretive programs and activities.

AUGUST 1999

FORM 0608 (2)

Reviewing Agencies Checklist

KEY

S = Document sent by lead agency

X = Document sent by SCH

✓ = Suggested distribution

Resources Agency

Boating & Waterways

Coastal Commission

Coastal Conservancy

Colorado River Board

Conservation

S Fish & Game

Forestry & Fire Protection

Office of Historic Preservation

S Parks & Recreation

Reclamation Board

S.F. Bay Conservation & Development Commission

Water Resources (DWR)

Business, Transportation & Housing

Aeronautics

California Highway Patrol

S CALTRANS District # 11

Department of Transportation Planning (headquarters)

Housing & Community Development

Food & Agriculture

Health & Welfare

Health Services

State & Consumer Services

General Services

OLA (Schools)

Environmental Protection Agency

Air Resources Board

California Waste Management Board

SWRCB: Clean Water Grants

SWRCB: Delta Unit

SWRCB: Water Quality

Regional WQCB # _____ ()

Youth & Adult Corrections

Corrections

Independent Commissions & Offices

Energy Commission

S Native American Heritage Commission

Public Utilities Commission

Santa Monica Mountains Conservancy

State Lands Commission

Tahoe Regional Planning Agency

Other _____

Public Review Period (to be filled in by lead agency)

Starting Date February 8, 2002

Ending Date March 9, 2002

Signature

Tina Robin

Date February 6, 2002

Lead Agency (Complete if applicable):

Consulting firm: _____

Address: _____

City/State/Zip: _____

Contact: _____

Phone: () _____

Applicant: _____

City/State/Zip: _____

Phone: () _____

For SCH Use Only:

Date Received at SCH _____

Date Review Starts _____

Date to Agencies _____

Date to SCH _____

Clearance Date _____

Notes:

DEPARTMENT OF FISH AND GAME

South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
(858) 467-4235 FAX



March 12, 2002

Ms. Tina Robinson
Associate Park and Recreation Specialist
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego CA 92198

**Comments on the Notice of Preparation of a Draft Environmental Impact Report for the
Anza Borrego State Park General Plan (SCH# 2002021060)**

Dear Ms. Robinson :

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381 respectively. As a Trustee Agency, the Department must be consulted by the Lead Agency during the preparation and public review for project-specific CEQA documents. As a Trustee Agency, the Department reviews proposed projects, comments on their impacts, and determines whether the mitigation measures or alternatives proposed are feasible and appropriate. Pursuant to Section 1802 of the Fish and Game Code, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and habitat necessary for biologically sustainable populations of those species. Under the California Endangered Species Act, it is the policy of the State to conserve, protect, restore, and enhance any endangered species or any threatened species and its habitat (Section 2052 of the Fish and Game Code). The Department also administers the Natural Community Conservation Planning Program (NCCP). We look forward to working with you on the proposed development of the General Plan, which represents a unique opportunity to protect the biological resources within the State Park.

The proposed General Plan will delineate a number of resource management zones and a set of goals and guidelines will be developed for each zone which will guide park management, specific project management, and implementation. These goals and guidelines will address recreational, operational, interpretive, and resource management opportunities and constraints. The General Plan will not locate or design facilities, but will provide goals and guidelines for the appropriate types, locations, and designs of facilities that may be proposed in the future. Additional environmental review will be conducted as site specific management plans and future projects and any corresponding mitigation measures are prepared / proposed. Regarding potential impacts on biological resources, the Environmental Checklist and Explanation of

Answers states, "The General Plan calls for an ongoing study to monitor sensitive species and their habitats as related to management zones. Should a sensitive resource be identified, facilities will be designed and constructed to avoid or minimize the impact. Guidelines within the General Plan protect and enhance park resources i.e., view sheds, cultural resources, wildlife and plants."

To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the DEIR:

1. A complete discussion of the purpose and need for, and description of, the proposed project.
2. A complete list and assessment of the flora and fauna within and surrounding each resource management zone (RMZ) delineated in the General Plan, with particular emphasis upon identifying State or federally listed rare, threatened, endangered, or proposed candidate species, California Species-of-Special Concern and/or State Protected or Fully Protected species, and any locally unique species and sensitive habitats. Depending on the size of each RMZ, we believe it would be useful to provide a separate analysis for each one. Specifically, the DEIR should include:
 - a. A thorough assessment of Rare Natural Communities on site and within each RMZ, following the Department's Guidelines for Assessing Impacts to Rare, Threatened, and Endangered Plants and Natural Communities (Attachment 1; revised May 8, 2000).
 - b. A current inventory of the biological resources associated with each habitat type within each RMZ. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - c. An inventory of rare, threatened, and endangered species within and surrounding each RMZ. This should include animal species that pass through an RMZ, but do not necessarily reside in it. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, Section 15380).
 - d. Discussions regarding seasonal variations in use by sensitive species of each RMZ, using acceptable species-specific survey procedures as determined through consultation with the Department. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
3. If any specific construction / development is contemplated during, and resulting from, the development of the General Plan (including roads or trails pursuant to the proposed roads

and trails management component) within the project area, a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DEIR should provide:

- a. Specific acreage and descriptions of the types of wetlands, coastal sage scrub, and other sensitive habitats that will or may be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.
- b. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.
- c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.
- d. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed NCCP reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
- e. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
- f. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.
- g. If applicable, an analysis of the effect that the project may have on completion and implementation of regional and/or subregional conservation programs. Under Section

2800 through Section 2840 of the Fish and Game Code, the Department, through the NCCP program, is coordinating with local jurisdictions, landowners, and the Federal Government to preserve local and regional biological diversity. Coastal sage scrub is the first natural community to be planned for under the NCCP program. The Department recommends that the Lead Agency ensure that the development of this and other proposed projects do not preclude long-term preserve planning options and that projects conform with other requirements of the NCCP program. Jurisdictions participating in the NCCP program should assess specific projects for consistency with the NCCP Conservation Guidelines. Additionally, the jurisdictions should quantify and qualify: 1) the amount of coastal sage scrub within their boundaries; 2) the acreage of coastal sage scrub habitat removed by individual projects; and 3) any acreage set aside for mitigation. This information should be kept in an updated ledger system.

4. Mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Measures to fully avoid and otherwise protect Rare Natural Communities (Attachment 2) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. For unavoidable impacts, off-site mitigation through acquisition and preservation in perpetuity of the affected habitats should be addressed. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

This discussion should include measures to perpetually protect the targeted habitat values where preservation and/or restoration is proposed. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic depicting the mitigation area; (d) time of year that planting will occur; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the entity(ies) that will guarantee achieving the success criteria and provide for conservation of the mitigation site in perpetuity.

Mitigation measures to alleviate indirect project impacts on biological resources must be included, including measures to minimize changes in the hydrologic regimes on site, and

means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.

5. Descriptions and analyses of a range of alternatives to ensure that alternatives to the proposed project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise reduce impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas of lower resource sensitivity where appropriate.

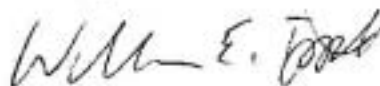
The Department has responsibility for the conservation of wetland and riparian habitats. It is the policy of the Department to strongly discourage development in or conversion of wetlands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

If appropriate, a jurisdictional delineation of lakes, streams, and associated riparian habitats should be included in the EIR, including a wetland delineation pursuant to the U.S. Fish and Wildlife Service definition (Cowardin 1979) adopted by the Department. Please note that wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

Future construction projects in the Anza Borrego Desert may require a Streambed Alteration Agreement (SAA) from the Department under Fish and Game Code Section 1600 *et seq.* The Department would like to discuss with the Department of Parks and Recreation the possibility of developing a master SAA for all projects within the State Park that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake.

The Department appreciates the opportunity to comment on this NOP. Please contact Libby Lucas of the Department at (858) 467-4230 if you have any questions or comments concerning this letter.

Sincerely,



William E. Tippetts
Environmental Program Manager

Ms. Tina Robinson
March 12, 2002
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Literature Cited

Cowardin, Lewis M., V. Carter, G. C. Golet, and E. T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. Fish and Wildlife Service, U.S. Department of the Interior. U. S. Government Printing Office, Washington, D.C.

Attachments

cc: Department of Fish and Game
Files
San Diego

State Clearinghouse
Sacramento

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted, and what information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:
 - a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
 - b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.
3. Botanical consultants should possess the following qualifications:
 - a. Experience conducting floristic field surveys;
 - b. Knowledge of plant taxonomy and plant community ecology;
 - c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
 - d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
 - e. Experience with analyzing impacts of development on native plant species and communities.
4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:
 - a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

- b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.
 - c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
 - d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.
 - e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.
5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:
- a. Project description, including a detailed map of the project location and study area.
 - b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
 - c. Detailed description of survey methodology.
 - d. Dates of field surveys and total person-hours spent on field surveys.
 - e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
 - f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
 - g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
 - h. Recommended measures to avoid impacts.
 - i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
 - j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
 - k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
 - l. Name of field investigator(s).
 - j. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

ATTACHMENT 2

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
- S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
- S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

- S1.1 = very threatened
- S2.2 = threatened
- S3.3 = no current threats known

Sensitivity Rankings (February 1992)

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest Sonoran Cottonwood Willow Riparian Mesquite Bosque Elephant Tree Woodland Crucifixion Thorn Woodland Allthorn Woodland Arizonan Woodland Southern California Walnut Forest Mainland Cherry Forest Southern Bishop Pine Forest Torrey Pine Forest Desert Mountain White Fir Forest Southern Dune Scrub Southern Coastal Bluff Scrub Maritime Succulent Scrub Riversidean Alluvial Fan Sage Scrub Southern Maritime Chaparral Valley Needlegrass Grassland Great Basin Grassland Mojave Desert Grassland Pebble Plains Southern Sedge Bog Cismontane Alkali Marsh

S1.2	<p>Southern Foredunes</p> <p>Mono Pumice Flat</p> <p>Southern Interior Basalt Flow Vernal Pool</p>
S2.1	<p>Venturan Coastal Sage Scrub</p> <p>Diegan Coastal Sage Scrub</p> <p>Riversidean Upland Coastal Sage Scrub</p> <p>Riversidean Desert Sage Scrub</p> <p>Sagebrush Steppe</p> <p>Desert Sink Scrub</p> <p>Mafic Southern Mixed Chaparral</p> <p>San Diego Mesa Hardpan Vernal Pool</p> <p>San Diego Mesa Claypan Vernal Pool</p> <p>Alkali Meadow</p> <p>Southern Coastal Salt Marsh</p> <p>Coastal Brackish Marsh</p> <p>Transmontane Alkali Marsh</p> <p>Coastal and Valley Freshwater Marsh</p> <p>Southern Arroyo Willow Riparian Forest</p> <p>Southern Willow Scrub</p> <p>Modoc-Great Basin Cottonwood Willow Riparian</p> <p>Modoc-Great Basin Riparian Scrub</p> <p>Mojave Desert Wash Scrub</p> <p>Engelmann Oak Woodland</p> <p>Open Engelmann Oak Woodland</p> <p>Closed Engelmann Oak Woodland</p> <p>Island Oak Woodland</p> <p>California Walnut Woodland</p> <p>Island Ironwood Forest</p> <p>Island Cherry Forest</p> <p>Southern Interior Cypress Forest</p> <p>Bigcone Spruce-Canyon Oak Forest</p>
S2.2	<p>Active Coastal Dunes</p> <p>Active Desert Dunes</p> <p>Stabilized and Partially Stabilized Desert Dunes</p> <p>Stabilized and Partially Stabilized Desert Sandfield</p> <p>Mojave Mixed Steppe</p> <p>Transmontane Freshwater Marsh</p> <p>Coulter Pine Forest</p> <p>Southern California Fellfield</p> <p>White Mountains Fellfield</p>
S2.3	<p>Bristlecone Pine Forest</p> <p>Limber Pine Forest</p>